

EXHIBIT B

THE HONORABLE ROBERT S. LASNIK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KAELEI GARNER, *et al.*,

Case No. 2:21-cv-00750-RSL

Plaintiffs,

SERGE EGELMAN'S RESPONSES AND OBJECTIONS TO DEFENDANTS' SUBPOENA FOR THE PRODUCTION OF DOCUMENTS

AMAZON.COM, INC. and AMAZON.COM SERVICES LLC,

Defendants.

1 Dr. Serge Egelman hereby provides the following Objections and Responses to Defendants
2 Amazon.com Inc. and Amazon.com Services LLC's ("Defendants") Subpoena to Produce
3 Documents. Dr. Egelman has not completed his investigation of the facts relating to this case,
4 discovery in this action, or preparation for trial. Dr. Egelman provides these responses only to the
5 extent that he possesses relevant and responsive information. Dr. Egelman reserves all his rights to
6 supplement these responses should more information become available.
7

8 **PRELIMINARY STATEMENT**

9 All the answers contained herein are based only on such information and documents that are
10 presently available to and specifically known to Dr. Egelman. Further investigation and discovery
11 may supply additional facts, which may require these responses to be supplemented. Thus, the
12 following responses are given without prejudice to Dr. Egelman's rights to supplement or amend
13 them, or to produce evidence of subsequently discovered facts that Dr. Egelman may recall or learn
14 at a later date.
15

16 **OFFER TO CONFER**

17 Dr. Egelman offers to confer in good faith to resolve any issues that may arise by virtue of
18 these Responses and Objections.
19

20 **SPECIFIC RESPONSES TO REQUESTS FOR PRODUCTION**

21 **REQUEST NO. 1:**

22 All engagement agreements for Your work in this Action.
23

24 **RESPONSE TO REQUEST NO. 1:**

25 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
26 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C). Dr. Egelman is not
27 withholding documents based on these objections.
28

1 Subject to and without waiving the foregoing objections, Dr. Egelman will produce his
2 engagement agreement for this matter.

3 **REQUEST NO. 2:**¹

4 All documents describing the nature and scope of Your work related to this Action,
5 excluding communications protected from disclosure by Fed. R. Civ. P. 26(b)(4)(B) and (C).

6 **RESPONSE TO REQUEST NO. 2:**

7 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
8 information pursuant to Fed. R. Civ. P. 26(b)(3)(A). Dr. Egelman objects to this Request as
9 duplicative of Request No. 1. Dr. Egelman objects to this Request as overly broad and unduly
10 burdensome to the extent it asks for “all” documents, as opposed to “documents sufficient to show,”
11 and as vague and ambiguous to the extent it calls for documents describing the “nature” and “scope”
12 of Dr. Egelman’s work. Dr. Egelman is not withholding documents based on these objections.

13 Subject to and without waiving the foregoing objections, Dr. Egelman will produce his
14 engagement agreement for this matter, which is sufficient to show his assignment for this matter.

15 **REQUEST NO. 3:**²

16 Documents sufficient to show Your complete time and billing related to this Action.

17 **RESPONSE TO REQUEST NO. 3:**

18 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
19 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman is
20 not withholding documents based on these objections.

21 ¹ Defendants incorrectly numbered this Request as a second “Request for Production No. 1.”

22 ² Defendants incorrectly numbered this Request as “Request for Production No. 2.”

1 Subject to and without waiving the foregoing objections, Dr. Egelman will produce his time
2 and billing records for this Action, but with any privileged or confidential information redacted from
3 the billing descriptions.

4 **REQUEST NO. 4:**³

5 All documents You relied upon in the preparation of Your Report.

6 **RESPONSE TO REQUEST NO. 4:**

7 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
8 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman
9 objects to this Request as seeking documents that are publicly available or equally accessible to
10 Defendants. Dr. Egelman objects to this Request as seeking documents that are within Defendants'
11 possession, custody, or control. Dr. Egelman is not withholding documents based on these
12 objections.

13 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
14 all documents that Dr. Egelman relied on to prepare his Report are identified in his Report. Dr.
15 Egelman will produce documents identified in his Report that are not publicly accessible or require
16 payment or a subscription to access.

17 **REQUEST NO. 5:**

18 All documents You considered but did not rely upon when preparing Your Report.

19 **RESPONSE TO REQUEST NO. 5:**

20 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
21 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman
22 objects to this Request as seeking documents that are publicly available or equally accessible to

23
24
25
26
27 ³ Defendants incorrectly numbered this Request as "Request for Production No. 3."
28

1 Defendants. Dr. Egelman objects to this Request as seeking documents that are within Defendants' 2 possession, custody, or control. Dr. Egelman is not withholding documents based on these 3 objections.

4 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
5 all documents that Dr. Egelman relied on to prepare his Report are identified in his Report. Dr.
6 Egelman will produce documents identified in his Report that are not publicly accessible or require
7 payment or a subscription to access.

8 **REQUEST NO. 6:**

9 All documents You expect to rely upon for any opinions or expected testimony in this case
10 that are not referenced in Exhibit B of Your Report.

11 **RESPONSE TO REQUEST NO. 6:**

12 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
13 information pursuant to Fed. R. Civ. P. 26(b)(3)(A), 26(b)(4)(B), and 26(b)(4)(C). Dr. Egelman
14 objects to this Request as seeking documents that are publicly available or equally accessible to
15 Defendants. Dr. Egelman objects to this Request as seeking documents that are within Defendants'
16 possession, custody, or control. Dr. Egelman objects to this Request as vague and ambiguous to the
17 extent it Requests documents Dr. Egelman "expect[s]" to rely on. Dr. Egelman is not withholding
18 documents based on these objections.

19 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
20 all documents that Dr. Egelman relied on to prepare his Report are identified in his Report. Dr.
21 Egelman will produce documents identified in his Report that are not publicly accessible or require
22 payment or a subscription to access.

23 **REQUEST NO. 7:**

1 All communications You relied upon in the preparation of Your Report, excluding
2 communications protected from disclosure by Fed. R. Civ. P. 26(b)(4)(B) and (C).

3 **RESPONSE TO REQUEST NO. 7:**

4 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
5 information pursuant to Fed. R. Civ. P. 26(b)(3)(A). Dr. Egelman objects to this Request to the
6 extent it seeks Defendants' own communications, which are equally accessible to Defendants and
7 within Defendants' possession, custody, or control.

8 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
9 other than any of Defendants' communications cited in the Report (e.g., by bates number), no non-
10 privileged communications exist.

11 **REQUEST NO. 8:**

12 All communications that You expect to rely upon for any opinions or expected testimony in
13 this case, excluding communications protected from disclosure by Fed. R. Civ. P. 26(b)(4)(B) and
14 (C).

15 **RESPONSE TO REQUEST NO. 8:**

16 Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
17 information pursuant to Fed. R. Civ. P. 26(b)(3)(A). Dr. Egelman objects to this Request to the
18 extent it seeks Defendants' own communications, which are equally accessible to Defendants and
19 within Defendants' possession, custody, or control.

20 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
21 other than any of Defendants' communications cited in the Report (e.g., by bates number), no non-
22 privileged communications exist.

23 **REQUEST NO. 9:**

1 All documents relating to results of any tests or experiments conducted by You or at Your
2 direction relating to this Action.

3 **RESPONSE TO REQUEST NO. 9:**

4 Dr. Egelman objects to this Request objects as overly broad and unduly burdensome to the
5 extent it asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman
6 objects to this Request as vague and ambiguous to the extent it calls for the production of “tests” or
7 “experiments.” Dr. Egelman is not withholding any documents based on these objections.

8 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
9 no such documents exist.

10 **REQUEST NO. 10:**

11 All documents relating to any surveys conducted by You or at Your direction relating to this
12 Action.

13 **RESPONSE TO REQUEST NO. 10:**

14 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
15 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
16 this Request as vague and ambiguous to the extent it calls for the production of “surveys.” Dr.
17 Egelman is not withholding any documents based on these objections.

18 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
19 no such documents exist.

20 **REQUEST NO. 11:**

21 All documents relating to any interviews conducted by You or at Your direction related to
22 this Action.

23 **RESPONSE TO REQUEST NO. 11:**

1 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
2 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
3 this Request as vague and ambiguous to the extent it calls for the production of “interviews.” Dr.
4 Egelman is not withholding any documents based on these objections.
5

6 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
7 no such documents exist.
8

REQUEST NO. 12:

9 All documents concerning Your knowledge, skill, experience, training, and education in the
10 areas for which You seek to be qualified as an expert in this Action.
11

RESPONSE TO REQUEST NO. 12:

12 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
13 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
14 this Request as vague and ambiguous to the extent it calls for the production of documents
15 concerning Dr. Egelman’s “knowledge, skill, experience, training, and education.” Dr. Egelman
16 objects to this Request as seeking documents that are publicly available or equally accessible to
17 Defendants. Dr. Egelman is not withholding any documents based on these objections.
18

19 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
20 documents relating to Dr. Egelman’s “knowledge, skill, experience, training, and education” are set
21 forth in his resume. Dr. Egelman will produce documents set forth in his resume that are not publicly
22 accessible or require payment or a subscription to access.
23

REQUEST NO. 13:

25 All documents relating to each assumption You made in forming the opinions and
26 conclusions in Your Report.
27
28

1 **RESPONSE TO REQUEST NO. 13:**

2 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
3 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
4 this Request as vague and ambiguous to the extent it calls for the production of documents
5 concerning any “assumption” Dr. Egelman made. Dr. Egelman objects to this Request to the extent
6 it seeks privileged and confidential information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and
7 26(b)(4)(C)(i)-(ii).

8
9 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
10 no such documents exist, and all documents that formed the basis for the opinions and conclusions
11 in the Report are cited in his Report.

12 **REQUEST NO. 14:**

13 All sworn testimony by You as an expert witness, including affidavits, declarations,
14 deposition transcripts or trial transcripts where You testified in the last four years.

16 **RESPONSE TO REQUEST NO. 14:**

17 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
18 asks for “all” testimony, as opposed to “documents sufficient to show.” Dr. Egelman objects to this
19 Request as overly broad and unduly burdensome because it seeks “all” “affidavits, declarations,
20 deposition transcripts or trial transcripts” over a four-year period. Dr. Egelman objects to this
21 Request to the extent it seeks documents that are publicly available and equally accessible to
22 Defendants. Dr. Egelman objects to this Request to the extent it seeks expert materials that are
23 privileged, confidential, or subject to protective orders in other matters. Dr. Egelman objects to this
24 Request because he has already disclosed all matters to Defendants that he worked on as part of his
25 May 10, 2024 expert disclosure.

1 Based on the foregoing objections, Dr. Egelman will not respond to this Request. Dr.
2 Egelman is willing to meet and confer regarding the scope of this Request.
3

4 **REQUEST NO. 15:**
5

6 All documents relating to results described in Your publication, "Information Disclosure
7 Concerns in The Age of Wearable Computing."

8 **RESPONSE TO REQUEST NO. 15:**
9

10 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
11 asks for "all" documents, as opposed to "documents sufficient to show." Dr. Egelman objects to
12 this Request as vague and ambiguous to the extent it calls for the production of documents
13 concerning the "results" described in the above-referenced publication. Dr. Egelman objects to this
14 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
15 Egelman objects to this Request to the extent it seeks privileged and confidential information
16 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

17 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
18 all documents that Dr. Egelman relied on in the publication, "Information Disclosure Concerns in
19 The Age of Wearable Computing," are set forth in the "References" section of the publication, which
20 is publicly available.

21 **REQUEST NO. 16:**
22

23 All documents relating to responses to surveys that are described in Your publication,
24 "Information Disclosure Concerns in The Age of Wearable Computing."

25 **RESPONSE TO REQUEST NO. 16:**
26

27 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
28 asks for "all" documents, as opposed to "documents sufficient to show." Dr. Egelman objects to

1 this Request as vague and ambiguous to the extent it calls for the production of documents
2 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
3 objects to this Request as seeking documents that are publicly available or equally accessible to
4 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
5 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
6

7 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
8 all documents that Dr. Egelman relied on in the publication, “Information Disclosure Concerns in
9 The Age of Wearable Computing,” are set forth in the “References” section of the publication, which
10 is publicly available.

11 **REQUEST NO. 17:**

12 All documents relating to results described in Your publication, “Privacy Attitudes of Smart
13 Speaker Users. Proceedings on Privacy Enhancing Technologies.”
14

15 **RESPONSE TO REQUEST NO. 17:**

16 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
17 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
18 this Request as vague and ambiguous to the extent it calls for the production of documents
19 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
20 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
21 Egelman objects to this Request to the extent it seeks privileged and confidential information
22 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
23

24 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
25 all documents that Dr. Egelman relied on in the publicly available publication, “Privacy Attitudes
26

1 of Smart Speaker Users. Proceedings on Privacy Enhancing Technologies,” are identified in the
2 publication as citations.

3 **REQUEST NO. 18:**

4 All documents relating to responses to surveys that are described in Your publication,
5 “Privacy Attitudes of Smart Speaker Users. Proceedings on Privacy Enhancing Technologies.”
6

7 **RESPONSE TO REQUEST NO. 18:**

8 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
9 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
10 this Request as vague and ambiguous to the extent it calls for the production of documents
11 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
12 objects to this Request as seeking documents that are publicly available or equally accessible to
13 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
14 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

15 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
16 all documents that Dr. Egelman relied on in the publicly available publication, “Privacy Attitudes
17 of Smart Speaker Users. Proceedings on Privacy Enhancing Technologies,” are identified in the
18 publication as citations.

19 **REQUEST NO. 19:**

20 All documents relating to results described in Your publication, “Investigating Users’
21 Preferences and Expectations for Always-Listening Voice Assistants.”

22 **RESPONSE TO REQUEST NO. 19:**

23 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
24 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
25

1 this Request as vague and ambiguous to the extent it calls for the production of documents
2 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
3 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
4 Egelman objects to this Request to the extent it seeks privileged and confidential information
5 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
6

7 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
8 all documents that Dr. Egelman relied on in the publicly available publication, “Investigating Users’
9 Preferences and Expectations for Always-Listening Voice Assistants,” are set forth in the
10 “References” section of the publication.

11 **REQUEST NO. 20:**

12 All documents relating to responses to surveys described in Your publication, “Investigating
13 Users’ Preferences and Expectations for Always-Listening Voice Assistants.”
14

15 **RESPONSE TO REQUEST NO. 20:**

16 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
17 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
18 this Request as vague and ambiguous to the extent it calls for the production of documents
19 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
20 objects to this Request as seeking documents that are publicly available or equally accessible to
21 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
22 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
23

24 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
25 all documents that Dr. Egelman relied on in the publicly available publication, “Investigating Users’
26
27

1 Preferences and Expectations for Always-Listening Voice Assistants,” are set forth in the
2 “References” section of the publication.

3 **REQUEST NO. 21:**

4 All documents relating to results described in Your publication, “I’ve got 99 problems, but
5 vibration ain’t one: a survey of smartphone users’ concerns.”

6 **RESPONSE TO REQUEST NO. 21:**

7 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
8 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
9 this Request as vague and ambiguous to the extent it calls for the production of documents
10 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
11 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
12 Egelman objects to this Request to the extent it seeks privileged and confidential information
13 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

14 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
15 all documents that Dr. Egelman relied on in the publicly available publication, “I’ve got 99
16 problems, but vibration ain’t one: a survey of smartphone users’ concerns,” are set forth in the
17 “References” section of the publication.

18 **REQUEST NO. 22:**

19 All documents relating to responses to surveys that are described in Your publication, “I’ve
20 got 99 problems, but vibration ain’t one: a survey of smartphone users’ concerns.”

21 **RESPONSE TO REQUEST NO. 22:**

22 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
23 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to

1 this Request as vague and ambiguous to the extent it calls for the production of documents
2 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
3 objects to this Request as seeking documents that are publicly available or equally accessible to
4 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
5 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
6

7 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
8 all documents that Dr. Egelman relied on in the publicly available publication, “I’ve got 99
9 problems, but vibration ain’t one: a survey of smartphone users’ concerns,” are set forth in the
10 “References” section of the publication.

11 **REQUEST NO. 23:**

12 All documents relating to results described in Your publication, ““What can’t data Be used
13 for?: privacy expectations about smart TVs in the U.S.”
14

15 **RESPONSE TO REQUEST NO. 23:**

16 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
17 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
18 this Request as vague and ambiguous to the extent it calls for the production of documents
19 concerning the “results” described in the above-referenced publication. Dr. Egelman objects to this
20 Request as seeking documents that are publicly available or equally accessible to Defendants. Dr.
21 Egelman objects to this Request to the extent it seeks privileged and confidential information
22 pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).
23

24 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
25 all documents that Dr. Egelman relied on in the publicly available publication, ““What can’t data
26
27

1 Be used for?’: privacy expectations about smart TVs in the U.S.,” are set forth in the “References”
2 section of the publication.

3 **REQUEST NO. 24:**

4 All documents relating to responses to surveys that are described in Your publication,
5 ““What can’t data Be used for?’: privacy expectations about smart TVs in the U.S.”
6

7 **RESPONSE TO REQUEST NO. 24:**

8 Dr. Egelman objects to this Request as overly broad and unduly burdensome to the extent it
9 asks for “all” documents, as opposed to “documents sufficient to show.” Dr. Egelman objects to
10 this Request as vague and ambiguous to the extent it calls for the production of documents
11 concerning the “responses to surveys” described in the above-referenced publication. Dr. Egelman
12 objects to this Request as seeking documents that are publicly available or equally accessible to
13 Defendants. Dr. Egelman objects to this Request to the extent it seeks privileged and confidential
14 information pursuant to Fed. R. Civ. P. 26(b)(3)(A) and 26(b)(4)(C)(i)-(ii).

15 Subject to and without waiving the foregoing objections, Dr. Egelman responds as follows:
16 all documents that Dr. Egelman relied on in the publicly available publication, ““What can’t data Be
17 used for?’: privacy expectations about smart TVs in the U.S.,” are set forth in the “References”
18 section of the publication.

19 DATED: July 26, 2024

20 By: /s/ Bradley S. Keller
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26 *Interim Liaison Counsel*

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SERGE EGELMAN'S RESPONSES
AND OBJECTIONS TO SUBPOENA
CASE No. 2:21-cv-00750-RSL

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26 *Interim Class Counsel*

PROOF OF SERVICE

I hereby certify that, on July 26, 2024, I served the foregoing document on all counsel of record via e-mail.

By: s/ Max S. Roberts

Max S. Roberts

SERGE EGELMAN'S RESPONSES
AND OBJECTIONS TO SUBPOENA
CASE No. 2:21-cv-00750-RSL

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